

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
(SPARTANBURG DIVISION)**

JANE DOE,  
Plaintiff/Petitioner/USA,

v.  
LIMESTONE UNIVERSITY F/K/A  
LIMESTONE COLLEGE, et al,  
Defendant/Respondent.

Case No. 7:21-CV-03193-DCC

**Application/Affidavit for**

***Pro Hac Vice Admission***

(1) **Name.** Sean Taheri  
First Middle Last

(2) **Residence.** I reside in the following state: California  
If a South Carolina resident, indicate months/years of residence: \_\_\_\_\_

(3) **Business Address.** I am an attorney and practice law under the name of or as a member of the following firm:

Firm name: Quinn Emanuel Urquhart & Sullivan, LLP

Mailing address: 865 Figueroa Street, 10<sup>th</sup> Floor City/State/Zip Los Angeles, California 90017

Telephone number: (213) 443-3000 \_\_\_\_\_

Facsimile number: (213) 443-3100 \_\_\_\_\_

E-mail address: seantaheri@quinnemanuel.com

(Application will not be considered without an e-mail address to receive electronic notification.)

(4) **Jurisdiction of this Court.** I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.<sup>1</sup>

(5) **Regular Practice of Law.** I am a member in good standing of the bar of the highest court of the District of Columbia or the State of California where I regularly practice law.  
**Attached is my certificate of good standing.**

(6) **Additional Bar Membership.** I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

<sup>1</sup>This District maintains a web site ([www.scd.uscourts.gov](http://www.scd.uscourts.gov)) from which the federal and local rules of procedure and related materials may be obtained.

Court	Date Admitted	Good Standing	
<u>See Attachment Below</u>		<input type="checkbox"/> Yes	<input type="checkbox"/> No
_____		<input type="checkbox"/> Yes	<input type="checkbox"/> No
_____		<input type="checkbox"/> Yes	<input type="checkbox"/> No

- (7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? ..... ☐ Yes ☒ No  
(If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

- (8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?  
☐ Yes ☒ No  
(If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

- (9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?  
☐ Yes ☒ No  
(If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

- (10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?  
☐ Yes ☒ No  
(If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

- (11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?  
☒ Yes ☐ No  
(If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

(1 of 1): United States District Court for the District of South Carolina, Spartanburg Division, Jane Doe v. Limestone University f/k/a Limestone College, et al, Case No. 7:20-CV-00947-DCC (consolidated for purposes with the instant case for discovery), same local counsel of record as indicated in No. (12) below, application submitted concurrently with the instant application.



- (12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Attorney Name: Mark Goddard; J. Kenneth Carter  
Firm Name: Turner Padget Graham and Laney, P.A.  
Street Address or Post Office Box: Post Office Box 1509  
City, State, and Zip Code: Greenville, South Carolina 29602  
Telephone Number: (803) 277-4334; (803) 400-1542  
E-Mail Address: kcarter@turnerpadget.com

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case:

Diane Cafferata, Michael E. Williams, Robert J. Becher, and Elinor Sutton of Quinn Emanuel Urquhart & Sullivan, LLP

- (14) Application Fee. I affirm that the application fee of three hundred and fifty dollars (\$350) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.

- (15) Electronic Notification. By submitting this application, I consent to electronic notification.

- (16) Represented Party/Parties. I seek to represent the following party/parties:

MG Freesites, LTD., MG Freesites LL LTD., MindGeek S.A.R.L., MindGeek USA, Inc.

- (17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.



Signature of Applicant

~~Sworn to and subscribed before me~~

~~this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.~~

~~A Notary Public  
of the State of \_\_\_\_\_~~

~~My Commission expires: \_\_\_\_\_~~

See  
Attached

BARS:

Bar Admitted

California

District of Columbia

Admission Date

12/04/2013

11/07/2014

UNITED STATES APPELLATE COURTS:

Admission Date

United States Court of Appeals for the Ninth Circuit

12/13/2013

UNITED STATES DISTRICT COURTS:

Admission Date

Federal Courts Admitted:

Central District of California

Western District of Tennessee

Northern District of California

12/18/2013

03/25/2015

12/09/2015

**CALIFORNIA JURAT**

**GOVERNMENT CODE § 8202**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of LOS ANGELES



Subscribed and sworn to (or affirmed) before me on

this 22ND day of MAY, 2024, by  
Date Month Year

(1) SEAN TAHERI

(and (2) \_\_\_\_\_),  
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature Lucille Clark  
Signature of Notary Public

Place Notary Seal and/or Stamp Above

**OPTIONAL**

*Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.*

**Description of Attached Document**

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_